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August 11, 2015

**VIA ECF**

Honorable Valerie Caproni  
United States District Judge  
40 Foley Square, Room 240  
New York, NY 10007

Re: *Mikell v. Forrest Staffing Solutions et al.* (14-CV-9595 (VEC))  
Request for Extension of Fact Discovery and Adjournment of Conference

Dear Judge Caproni:

I represent the Defendants in connection with the above-referenced matter, and I write on behalf of all parties to jointly respectfully request an extension of time to complete fact discovery (otherwise set to expire on August 14, 2015) and for an adjournment of the conference currently scheduled for August 21, 2015.

The parties can report to the Court that they have been working in good faith to move forward with discovery and that the exchange of some documents has been completed. However, various discovery requests remain outstanding. Moreover, the parties have yet to take depositions in this case.

Accordingly, and in further consideration of plaintiff's *pro se* status, the parties jointly respectfully request an extension of time to complete fact discovery to September 25, 2015, and to adjourn the upcoming conference until the end of September. No previous requests for an extension or adjournment have been made.

Thank you Your Honor for your attention to this matter.

Respectfully submitted,



Jason B. Klimpl

cc: Lamont Mikell